

Letter to FCC regarding Proceeding Number: 13-184

I write to provide Comments to the FCC on the E-Rate NPRM, proceeding 13-184. The E-Rate Program has been of great importance to the schools I serve because it has helped our students and teachers gain access to a wealth of online resources, to communicate and collaborate. Much of what they have now would not be affordable without this program. There are three primary concerns I share in this letter: 1) The demand for better and faster technology is strong and will continue, 2) Funding levels need to increase to support schools that are weak in this area and lack funding to improve on their own, and 3) Improvements in filing and processing are needed.

Respectfully

Stephen Bosacker, 2233 University Ave. W., Suite 450, St. Paul, MN 55114

1) Technology Need and Demand is strong among schools

Over the last 5 years internet connectivity requirements have tended to increase every few years. In the last 3 years the Minnesota Department of Education has required all public schools in Minnesota to administer the high stakes tests (MCA-II and MCA-III) by computer with direct connection via the internet to the state's testing system. This has pressed all schools to increase their bandwidth as the testing season times create some of the highest bandwidth demand for schools. To administer the tests internet connections need to be high quality. If a school loses internet connectivity during testing it is a serious problem for all involved.

This is one of a number of examples of how interdependence is increasing around internet and telecommunications for schools and education.

Other trends add to requirements "more and more materials are available online for educational use" tools that include video, audio and interactivity. The availability of older media technologies is waning, resulting in pressure on schools to upgrade hardware and equipment to give students quality learning experiences. In past years schools could rent movies (film). This shifted to Video cassettes. Then it shifted to CD and DVD. And now video media is becoming fully integrated with the internet. The demise of video rental companies and services means that online streaming of videos is one of the few options for families, businesses and schools. Either way, schools must have computers, the computers must be networked and secured and schools must have internet connectivity.

The E-Rate Program is great help, especially for high proportion free-reduced lunch student populations.

For the charter schools I serve, a majority of them serve student populations that are over 60% free-reduced lunch status. All these schools are in urban communities. For these schools E-Rate has

enabled them to improve their technologies and shift funds back to teaching and student learning resources. Some charter schools in the city with lower percentages of students with free or reduced lunch status are actually more constrained because they don't qualify for as much help through E-Rate, especially not for Priority 2 funding in a number of years.

2) Please invest more funds for E-Rate and expand qualifying criteria

Please increase funding if possible. Please fund closer to the demand, which some have suggested was \$5 billion last year. The demands on schools to improve and maximize the value of digital media for education are not easing. For schools internet access now requires more bandwidth and high quality connections. And from my experience, schools are a critical bridge for students and their families to learn and access internet resources.

If possible base the increase in funding levels for schools and criteria on factors on more than the proxy measurement of poverty (free or reduced lunch). The purpose of E-Rate is to increase accessibility in schools for the students and for learning. Wealthy school communities can cover many of these costs and schools with 90% reimbursement are well served by E-Rate. But there are many schools in between and especially all charter schools that have real technology needs but are constrained. We understand the poor economy contributed to lower levels of funding recently. But with a redesign of E-Rate, other criteria can benefit schools that missed out on technology improvements and discounts.

For students whose families have very low incomes (poverty) these families still have very limited access or knowledge of computer and internet technologies. Smartphones are becoming a new and slightly more affordable option for families have access the internet in a meaningful way. So school becomes a bridge for the children and families to knowledge and skills that could make a difference for them. The digital divide is very real. Those who are not part of the technology movement are easily left behind. How do people without internet access and ability to apply for jobs? Many companies only take applications online now. Our high schools with 90% reimbursement rates have filled this gap to support students in finding jobs. But this would be a need for some students at all schools.

3) Please continue to improve the approval processes within USAC.

In the last 3 years access to online filing for E-Rate has improved dramatically and this has been a great benefit to all involved. At the same time the requirements to prove a request is legitimate seem also to have increased. It appears there is a log-jam inside USAC that requires significant labor to get and then review documentation of Form 471 submissions. Now it seems every Form 471 requires direct communication with a reviewer. This is in part because we cannot submit all the documentation required when we file Form 471. Delays in this communication process are likely a significant drag on USAC staff and their ability to process the thousands of requests in timely manner. If we could know

what documents are needed to review and submit these ahead of time, then that could greatly ease the labor requirements. Please find ways to streamline and reduce these kinds of labor to devote more E-Rate funds to schools and libraries and to speed the approval processes.